

## EXHIBIT F

Page 1

IN THE UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA

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JOHN CALDERAIO  
c/o WEIR GREENBLATT PIERCE  
1339 Chestnut Street, Suite 500  
Philadelphia, PA 19107

Plaintiff,

-vs-

Civil Action No.  
2:23-cv-4218

CENTRAL BUCKS SCHOOL DISTRICT  
20 Weldon Drive, Doylestown, PA 18901  
Defendant.

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REMOTE DEPOSITION OF  
CHLOE GRAU  
10:03 a.m. to 10:52 a.m.  
March 24, 2025

Job No. 7275285

REPORTED BY: Rhonda D. Tuck, RPR, CRR

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1 Deposition of CHLOE GRAU, taken and transcribed  
2 on behalf of the Defendant, by and before Rhonda D.  
3 Tuck, RPR, CRR, Notary Public in and for the  
4 Commonwealth of Virginia at large, commencing at  
5 10:03 a.m., March 24, 2025, via remote  
6 videoconference.

7  
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9  
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I N D E X

TESTIMONY OF: CHLOE GRAU

Examination by Attorney Toth.....5

Examination by Attorney Shubin.....35

E X H I B I T S

(None)

\* \* \* \* \*

1 (10:03 a.m., March 24, 2025)

2 (Witness sworn.)

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4

CHLOE GRAU,

5

having been duly sworn, testified as follows:

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E X A M I N A T I O N

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BY ATTORNEY TOTH:

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Q. Good morning, Chloe. I know we met informally off the record. My name is Ashley Toth, I represent Central Bucks in a litigation that was filed John Calderaio. Your name was identified in discovery as a potential witness, so I'm here to take your deposition today.

14

15

Have you ever had your deposition taken before?

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17

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A. No.

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Q. Just to make sure this goes through a little smoothly, I'm going to go over a couple brief instructions. Okay?

A. Okay.

Q. Even though we're on a Zoom today, as you can see, there's a court reporter here. She's taking down everything that we say into a written transcript. The written transcript, she won't be able to reflect nods of the heads. "Uh-huhs" and

1 "huh-uhs" would appear the same on the record.

2 So when I ask a question, I'm going to  
3 ask that you give a verbal response. Okay?

4 A. Okay.

5 Q. In normal conversation, you may know  
6 what I'm going to say, but in order to keep a clear  
7 record, allow me to ask my full complete question  
8 first, and then you provide a verbal response after.  
9 Okay?

10 A. Okay.

11 Q. Even though we're in an informal  
12 setting, you understand that your testimony today  
13 has the same effect as though you were testifying in  
14 front of a court of law?

15 A. Yes.

16 Q. I don't want you to guess at all today.  
17 If you're going to estimate, please let me know  
18 you're estimating. Okay?

19 A. Okay.

20 Q. Today's testimony is not a guessing  
21 game. I'm not here to trick you. I want to  
22 understand your story. So if at any point you don't  
23 understand my question, just let me know that so I  
24 can rephrase the question.

25 A. Okay.

1 Q. And I ask the same question of every  
2 deponent: Are you under the influence of any  
3 prescription medication, drugs or alcohol, that  
4 would impair your ability to testify today?

5 A. No.

6 Q. Where are you today taking this  
7 deposition?

8 A. I'm currently in Charlotte, North  
9 Carolina. I live here, in my apartment, with my  
10 boyfriend.

11 Q. Are you the only person in the room  
12 today?

13 A. In this room, yes.

14 Q. Okay. Is there anything on the desk or  
15 table in front of you?

16 A. My phone is over here, but that's it.

17 Q. Okay. In preparation for today's  
18 deposition, did you talk to anyone about your  
19 deposition?

20 A. I talked to Andrew Shubin on Friday.

21 Q. Okay. And what did you talk about with  
22 Mr. Shubin?

23 A. Just about the case, about John, our  
24 story I guess back in high school.

25 Q. What did Mr. Shubin tell you about the



1 case?

2 A. I guess he didn't necessarily tell me  
3 anything about the case but just asked for my story  
4 and kind of John and I's progression through  
5 elementary school through high school.

6 Q. Did Mr. Shubin show you any records?

7 A. No.

8 Q. Did he show you any deposition  
9 transcripts?

10 A. No.

11 Q. Did he show you any criminal records?

12 A. No.

13 Q. Do you have any notes about the  
14 allegations here involving Mr. Ohrt and John  
15 Calderaio?

16 A. No.

17 Q. Do you have any text messages between  
18 yourself and John relating to anything in this case  
19 involving Dr. Ohrt?

20 A. No.

21 Q. Do you have any text messages between  
22 yourself and John?

23 A. Maybe years ago. Not recently.

24 Q. Okay. Do you still have the text  
25 messages between you and John?

1 A. I can look on my phone.

2 Q. Okay.

3 A. I actually have nothing.

4 Q. And I'll go through in more detail your  
5 version of everything that happened and what you  
6 know about the case, but what do you recall that you  
7 told Mr. Shubin?

8 A. Like, what aspect? What do you mean,  
9 that I recall?

10 Q. With as much specificity, what did you  
11 tell Mr. Shubin prior to today's deposition?

12 A. Okay. So I've known John since the  
13 sixth grade, and that's when we first met, and we on  
14 and off dated between the sixth grade and senior  
15 year of high school. Our families became really  
16 close. My mom was kind of like a mom to him.

17 When John went to high school, we didn't  
18 go to the same high school. I went to CB East, and  
19 he went to West. He got into the choir program  
20 there, and Dr. Ohrt became like a good person in his  
21 life that seemed to look out for him, and he seemed  
22 to want John to do well in the choir program, and  
23 John kind of found his passion within music at that  
24 time.

25 Q. I'm just going to take a step back. You

1       said you live in Charlotte, North Carolina, right  
2       now; is that right?

3             A.    Yes.

4             Q.    How long have you lived there?

5             A.    Four and a half years.

6             Q.    How old are you right now?

7             A.    27.

8             Q.    What's your date of birth?

9             A.    12/12/97.

10            Q.    And your boyfriend's name that you  
11       reside with?

12            A.    Kyle Shue.

13            Q.    Did you meet Kyle in North Carolina, or  
14       did he go to Central Bucks?

15            A.    He did not go to Central Bucks. He is  
16       from Pennsylvania, but I did not meet him there. I  
17       met him in college, at the University of South  
18       Carolina.

19            Q.    I'm just going to go through just a  
20       little bit of background. What year did you  
21       graduate high school?

22            A.    2016.

23            Q.    Okay. So you were the same grade as  
24       John Calderaio, correct?

25            A.    Yes.

1 Q. After you graduated, where did you go  
2 off to college?

3 A. The University of South Carolina.

4 Q. Did you ultimately graduate from the  
5 University of South Carolina?

6 A. Yes.

7 Q. And what was your degree in?

8 A. Nursing.

9 Q. Did you get your BSN, your bachelor of  
10 science in nursing?

11 A. Yes.

12 Q. What year did you receive your nursing  
13 degree?

14 A. 2020.

15 Q. Did you go on to attain any additional  
16 certifications or schooling after your BSN?

17 A. No schooling after my BSN, no.

18 Q. Where are you currently employed?

19 A. Atrium Health.

20 Q. Are you a nurse there?

21 A. Yes.

22 Q. And I want to take a step back and talk  
23 about your relationship with John Calderaio. Am I  
24 correct -- he says you dated from the age of 12 to  
25 20. Does that sound about right to you?

1 A. I would say 12 to 18.

2 Q. Okay. So 12, you would have been  
3 approximately in the sixth grade; is that right?

4 A. Yep.

5 Q. How did you meet John?

6 A. At school, elementary school, Cold  
7 Spring Elementary. I'm not sure the exact pinpoint,  
8 but I remember it was at school.

9 Q. Okay. When you say "dating" in the  
10 sixth grade, did you go to each other's houses?

11 A. Yes.

12 Q. What was John's home life like,  
13 beginning in the sixth grade?

14 A. It seemed very stable. His parents were  
15 still married. His brother and sister still lived  
16 there. It seemed like a very stable home life.

17 Q. At some point, did that change?

18 A. Yes.

19 Q. When did that change?

20 A. I would say the beginning of eighth  
21 grade.

22 Q. What happened around eighth grade?

23 A. His mom moved out of the house, and she  
24 started drinking and was starting to drive with the  
25 brother and sister in the car and got DUIs. Their

1 dad then would take vacations in Florida, weeks at a  
2 time, and would leave the kids in the house by  
3 themselves.

4 Q. When you say the dad would take  
5 vacations and leave the kids alone, was John's mom  
6 home with them?

7 A. No. She lived in an apartment by  
8 herself.

9 Q. Okay. How old was John? Was he still  
10 in the eighth grade when he was being left home  
11 alone by his dad?

12 A. Yeah. Whatever that age is, 14 maybe.

13 Q. Did John ever come and sleep at your  
14 house?

15 A. Yes.

16 Q. How often?

17 A. A few nights a week, I would say. In  
18 the ninth grade, maybe, he lived with us in our  
19 house. He had his own room in the house. I would  
20 say maybe around ninth grade, all three of the kids  
21 lived in our house at one point, for maybe a month  
22 or two.

23 Q. I'll try to take it one year at a time.  
24 In the sixth grade, when you first met John and you  
25 started dating, you would go to his house. In the

1 sixth grade, would you go to each other's houses?

2 A. Yes.

3 Q. How would you explain John, as a person?

4 Did he like sports? Did he like music? What kind  
5 of activities did he like?

6 A. He liked skateboarding.

7 ATTORNEY SHUBIN: Objection to form.

8 Go ahead.

9 THE WITNESS: He liked skateboarding.

10 He liked music. He liked hanging out with  
11 friends.

12 BY ATTORNEY TOTH:

13 Q. Did John have a best friend, that you  
14 recall?

15 A. I think he had many best friends.

16 Q. What were some of their names that you  
17 remember?

18 A. Thomas Kennedy, Michael Driver, Ryan  
19 Chalifoux. That's to name a few, I guess, that I  
20 can remember right now.

21 Q. Did John get into wrestling during the  
22 time that you were dating?

23 A. Yes. Yes.

24 Q. I understand that wrestling was big in  
25 his family; is that right?

1           A.    Yes.  His brother and his dad both did  
2   wrestling.

3           Q.    And then the seventh grade, still would  
4   you describe the home life as pretty stable?

5           A.    Yeah.

6           Q.    And the same thing, John would still  
7   come over to your house, and you would still go to  
8   his house; is that right?

9           A.    Yes.  I think in the seventh grade is  
10   when they moved houses, but we would still go over  
11   to each other's houses.

12          Q.    Okay.  At some point, did John start to  
13   experiment with alcohol and marijuana?

14          A.    Yes.

15          Q.    When would you -- if you can recall,  
16   approximately when did he start using alcohol or  
17   marijuana?

18          A.    Probably the eighth grade.

19          Q.    John's siblings.  His sister is younger  
20   than him; is that right?

21          A.    No.  His sister is older than him.

22          Q.    His sister is older.  Is his brother  
23   younger?

24          A.    His brother is older.  John is the  
25   youngest.



1 Q. John's the youngest. Okay.

2 And you said at some point in the eighth  
3 grade that all three siblings came to live with you;  
4 is that right?

5 A. Yes.

6 Q. Was there one particular event that  
7 caused them to move in with you?

8 A. I cannot recall a particular event.

9 Q. Okay. Did you ever have any  
10 conversations either with John or your parents about  
11 his home life?

12 ATTORNEY SHUBIN: Objection as to form.  
13 What time period are you talking about?

14 ATTORNEY TOTH: I'll start with any time  
15 period and see if she can recall, and then  
16 we'll narrow it down.

17 THE WITNESS: I would say the eighth  
18 grade is when my parents started talking  
19 about it and my mom was very concerned for  
20 the kids.

21 BY ATTORNEY TOTH:

22 Q. Did your mom ever make a ChildLine  
23 report or contact police in any way that the kids  
24 were being left home alone?

25 A. Not to my knowledge.

1 Q. Did your mom ever reach out to the  
2 Calderaio family to express any of her concerns?

3 A. Yes.

4 Q. Do you know who she spoke with?

5 A. I know that she had spoke with his --  
6 spoken with his mom that she was concerned. And the  
7 dad, she also made comments to him as well.

8 Q. To the best of your recollection, what  
9 did John's mom say back to your mother when she  
10 expressed her concerns?

11 ATTORNEY SHUBIN: Objection to form. If  
12 she wasn't there, she doesn't know.

13 Go ahead.

14 BY ATTORNEY TOTH:

15 Q. To your knowledge.

16 A. Not to my knowledge. I'm not really  
17 sure.

18 Q. Did your mom ever tell you what you  
19 John's mom said?

20 A. No, not to my knowledge.

21 Q. Did John's father ever say anything to  
22 you about him going to Florida for weeks on end?

23 A. No.

24 Q. Did your mother ask permission to have  
25 the three kids move in with you?

1 A. Not to my knowledge.

2 Q. And you said John had his own bedroom at  
3 your house. Did all of the three siblings have  
4 their own bedroom?

5 A. No.

6 Q. How long did John live at your house?

7 A. There were multiple time periods where  
8 he would live with us and then move out. That was  
9 all spread out throughout high school. He would  
10 live with us for maybe a few months at a time and  
11 then move back either with his mom or his dad.

12 Q. Do you recall a time period where he  
13 lived with two twin brothers?

14 A. Yes. Yes.

15 Q. Can you recall the names of those, of  
16 the twins?

17 A. Oleg and Eugene Chuzhinin.

18 Q. How long did he live there?

19 A. Also a few months, I believe.

20 Q. So beginning in the eighth grade, John  
21 temporarily lived with you, at least for a few  
22 months; is that right?

23 A. I would say the ninth grade. Probably  
24 not the eighth grade.

25 Q. Okay. When he moved out of living with

1       you, do you know where he moved to at that point?

2               A.     It's hard for me to recall what times  
3       that he did live with us and then when he didn't.  
4       He was moving around quite a lot throughout middle  
5       school and high school, so it's hard to remember  
6       when he lived with who I guess.

7               Q.     Did John ever express to you why he  
8       would move out of your house and back in with his  
9       parents?

10              A.     No.

11              Q.     At some point, did you become sexually  
12       intimate with John?

13              A.     Yes.

14              Q.     When, approximately?

15              A.     The end of the eighth grade.

16              Q.     At some point, did John ever express to  
17       you any sexual issues, any issues with intimacy?

18              A.     Not with me necessarily, but he did  
19       express to me at some point in high school that he  
20       thought he may be gay.

21              Q.     When was that?

22              A.     I want to say around tenth grade.

23              Q.     Were you dating John at the time?

24              A.     Not to my recollection. I don't think  
25       so.

1 Q. And you testified earlier that you dated  
2 him from approximately 12 years of age to 18. So  
3 were there a few times in there where you broke up?

4 A. Yes. We would only date for maybe three  
5 months at a time.

6 Q. Okay. Understanding that you dated  
7 three months at a time, would this sort of  
8 correspond with why John would move out of your  
9 house?

10 A. Maybe. I think there was a lot of  
11 different reasons, with his family and a lot of  
12 things that he would bundle up, I guess.

13 Q. John testified that he had some  
14 difficulty getting and maintaining an erection and  
15 lowered libido. Did he ever express this to you?

16 A. No.

17 Q. When he expressed to you that he thought  
18 he was gay, in the tenth grade, where were you when  
19 he had this conversation with you?

20 A. I believe we were at his house.

21 Q. Was anyone else present?

22 A. No.

23 Q. But you were not dating at the time?

24 A. No.

25 Q. What did you say to him?

1           A.    I expressed that I was also confused,  
2           because we had previously dated. I just tried to  
3           console him, since he was crying, and just tried to  
4           calm him down.

5           Q.    Did John tell you what led him to  
6           believing that he was gay? Was there anyone that he  
7           was attracted to?

8           A.    He thought that he might have a crush on  
9           another guy that was in our grade.

10          Q.    Who was that?

11          A.    Andrew Stuardi.

12          Q.    Can you spell his last name? Do you  
13          know?

14          A.    S-T-U-A-R-D-I.

15          Q.    To your knowledge, was Andrew gay?

16          A.    No.

17          Q.    Did John ever tell you that he kissed  
18          any men?

19          A.    No.

20          Q.    Did he ever attempt to become  
21          romantically involved in any way with Andrew?

22          A.    No.

23          Q.    At the time that John expressed to you  
24          that he thought he might be gay, do you know if John  
25          had met or was working with Dr. Ohrt at the time?

1           A.    I can't necessarily recall, but if we  
2           were in the tenth grade, we would have been in high  
3           school.

4           Q.    Was that the only time that John had  
5           expressed to you that he thought he was gay?

6           A.    Yes.

7           Q.    And then at some point, you started  
8           dating again, after that conversation; is that  
9           right?

10          A.    That was the end of 12th grade.

11          Q.    What was at the end of 12th grade? You  
12          started dating again?

13          A.    Yes.

14          Q.    So from tenth grade to 12th grade, you  
15          did not date?

16          A.    Correct.

17          Q.    Did you stay friends with John during  
18          that time?

19          A.    We were friends in the 11th grade. But  
20          all of the 12th grade, probably from August to May,  
21          we did not speak.

22          Q.    You seem to recall those dates pretty  
23          clearly. Is there some reason that you recall you  
24          did not speak during that time?

25          A.    I just remember all of senior year we

1 did not speak, and then around prom, which I believe  
2 was in May, we started talking again, and that a  
3 month after that he moved in with us again.

4 Q. How long did he live with you at that  
5 point?

6 A. From graduation until we broke up in  
7 October. But I went off to college in August, so he  
8 lived with my parents when I was in college.

9 Q. After you broke up in October, did he  
10 move out from your parents' house?

11 A. Yes.

12 Q. What was the reason you broke up?

13 A. I was in college, and I wasn't answering  
14 my phone, and he was at home and wanted me to text  
15 him back, and he just decided that we should not be  
16 dating anymore.

17 Q. He broke up with you?

18 A. Yes.

19 Q. Have you kept in touch with John since  
20 you broke up, I guess your freshman year of college?

21 A. We have talked one time on the phone.  
22 That was maybe three years ago now, and that's it.

23 Q. What did -- if you can recall -- you say  
24 you spoke one time on the phone. What did you talk  
25 about?



1           A.    He was starting to go to therapy, and he  
2           wanted to try to repair his relationships and  
3           apologize for the way that he behaved.

4           Q.    Were you aware that at some point John  
5           used cocaine?

6           A.    No.

7           Q.    Were you aware that at some point John  
8           went through substance abuse therapy, intensive  
9           outpatient?

10          A.    No.

11          Q.    Did John ever talk to you about anything  
12          relating to Dr. Ohrt?

13          A.    Yes.

14          Q.    What did he tell you?

15          A.    That Dr. Ohrt was his choir teacher, and  
16          he seemed to really want John to do well in the  
17          music industry. He seemed like another adult in his  
18          life that seemed to want him to do well.

19          Q.    You went to CB West, as well, am I  
20          right?

21          A.    No. I went to East.

22          Q.    You went to East. Did you ever meet  
23          Dr. Ohrt?

24          A.    Yes.

25          Q.    When did you meet Dr. Ohrt?

1           A.    I can't recall the specific grade, but I  
2   remember we would go to John's choir concerts, and  
3   we would talk to Dr. Ohrt at the end of the concert.

4           Q.    Did you ever express to John or to your  
5   mother any concerns about Dr. Ohrt?

6           A.    No.

7           Q.    Did your mother ever express to you any  
8   concerns that she had about John's relationship with  
9   Dr. Ohrt?

10          A.    Yes.

11          Q.    What did she tell you?

12          A.    I guess John told her that they went on  
13   a trip together and they smoked marijuana on the  
14   trip, and my mom thought that was concerning.

15          Q.    When was this trip that John smoked  
16   marijuana with Dr. Ohrt? Was he still in high  
17   school, or was this after graduation?

18          A.    I believe this was still in high school.

19          Q.    Were you dating John at the time?

20          A.    No.

21          Q.    So you only dated John in the tenth  
22   grade and then -- while in high school, the tenth  
23   grade, and then at the very end of your senior year?

24          A.    Yes.

25          Q.    Does that help refresh your memory at

1       what point this trip would have occurred? Was this  
2       during high school?

3               ATTORNEY SHUBIN: Objection. Asked and  
4       answered.

5               You can answer it again.

6               THE WITNESS: I'm honestly not  
7       completely sure. I just remember my mom  
8       telling me about the trip, and she was  
9       concerned. I don't recall when the trip was,  
10      to be honest.

11      BY ATTORNEY TOTH:

12              Q. Do you know where the trip was?

13              A. Somewhere in the Midwest.

14              Q. Kansas City? Does that sound familiar?

15              A. Sure.

16              Q. I don't want you to guess. If that  
17      refreshes your memory and you believe it was Kansas  
18      City, let me know that. If you really don't know,  
19      just tell me that as well.

20              A. I just remember it being somewhere in  
21      the Midwest. I'm not entirely sure where it was.

22              Q. Did John keep in touch with your mother  
23      after graduation?

24              A. Yes.

25              Q. Understanding he lived there probably

1 until October of 2016; is that right?

2 A. Yes.

3 Q. After October of 2016, did John keep in  
4 touch with your mother?

5 A. Yes.

6 Q. How often?

7 A. I can't say a specific amount. She  
8 would know more, but maybe every few weeks or so.

9 Q. To your knowledge, does your mother  
10 still talk to John?

11 A. No.

12 Q. After the one conversation in the tenth  
13 grade that John told you he thought he might be gay,  
14 did John ever express that to you again at any point  
15 in time?

16 A. No.

17 Q. Did you ever have any conversations when  
18 you started dating John again to ask him whether he  
19 had ever experimented?

20 A. No.

21 Q. Did you ever hear any comments or rumors  
22 that John was gay with Dr. Ohrt?

23 A. No.

24 Q. Did John ever tell you at any point that  
25 Dr. Ohrt hugged him or kissed him in choir?

1 A. No.

2 Q. Did you ever go to Dr. Ohrt's house?

3 A. I never went inside, but we picked John  
4 up from Dr. Ohrt's house.

5 Q. Why was John at Dr. Ohrt's house?

6 A. I'm not entirely sure. I can't recall  
7 why he was there. I just remember being in the  
8 driveway of his house.

9 Q. Did you ever see -- there was a barn at  
10 Dr. Ohrt's house. Did you ever go into the barn?

11 A. No.

12 Q. Did John ever tell you about the barn?

13 A. Not to my recollection.

14 Q. Did John ever tell you that while he was  
15 on a trip with Dr. Ohrt, Dr. Ohrt put his hands down  
16 his pants and tried to masturbate him?

17 A. No.

18 Q. Were you aware that John lived with  
19 Dr. Ohrt at some point?

20 A. Yes.

21 Q. How did you become aware of that?

22 A. What I remember, when we broke up for  
23 the last time when I was off at college, he moved  
24 out of our house, and he moved in with Dr. Ohrt.

25 Q. That would have been sometime after

1       October of 2016; is that right?

2               A.     Correct.

3               Q.     Were you aware that at some point John  
4       started dating a woman named Peyton?

5               A.     Yes.

6               Q.     Do you know Peyton?

7               A.     No. I met her maybe a couple times, but  
8       I don't know her very well.

9               Q.     Did John ever tell you that Peyton was  
10      physically abusive towards him?

11              A.     No.

12              Q.     Were you aware that there was a  
13      ChildLine report about Dr. Ohrt in April of 2016,  
14      right before your graduation?

15              A.     No.

16              Q.     Did John ever tell you that he was  
17      questioned by police with regards to the ChildLine  
18      report?

19              A.     No.

20              Q.     I know you didn't speak with John for a  
21      while, from tenth grade to 12th grade. When did you  
22      start speaking again?

23                      ATTORNEY SHUBIN: Objection as to form.

24                      BY ATTORNEY TOTH:

25                      Q.     You can answer.

1 A. Okay. May of 12th grade.

2 Q. So approximately May of 2016; is that  
3 right?

4 A. Yes.

5 Q. How did you start speaking again, if you  
6 can recall?

7 A. I honestly think I reached out to him,  
8 asking how he was doing.

9 Q. What did he say?

10 A. I can't recall the exact text messages.  
11 It was a long time ago, but I think he asked -- said  
12 that he was doing okay and was glad that I reached  
13 out.

14 Q. Did you go to prom with John?

15 A. No.

16 Q. Did you go to prom with someone else?

17 A. No.

18 Q. Did you go to prom?

19 A. I did go to prom. I left my date, and I  
20 went by myself.

21 Q. Did John have a prom date?

22 A. I can't remember.

23 Q. At some point, you started officially  
24 dating John again. Can you recall approximately  
25 when that was?

1 A. Sometime in May or June of that year.

2 Q. Where was John living at the time?

3 A. I cannot remember, actually.

4 Q. And then am I correct that once you  
5 started dating, John moved back in with you?

6 A. Correct.

7 Q. When you started dating again in May or  
8 June of 2016, were you sexually intimate with him?

9 A. Yes.

10 Q. Again, were there any issues with his  
11 intimacy?

12 A. Not that I can remember.

13 Q. Did John ever express to you that he  
14 felt any anxiety or depression?

15 A. Yeah.

16 Q. When did he first express that to you?

17 A. I can't recall a specific time. At some  
18 point in high school, I would say.

19 Q. Did John ever tell you anything that he  
20 believed was causing the anxiety or depression?

21 A. No.

22 Q. Did you ever recommend to him to see a  
23 counselor?

24 A. I recommended that he should go to  
25 therapy. Yeah.



1 Q. When did you first recommend that he go  
2 to therapy?

3 A. Again, I can't recall a specific time.

4 Q. Okay. When John was living with you in  
5 June of 2016, did you notice any behavioral changes  
6 in him since you had known him, since you were 12?

7 A. I think he always kind of had behavioral  
8 issues. Growing up, he had ADD and ADHD. So that  
9 was kind of his personality, I guess.

10 I would say probably in June, he might  
11 have seemed a little bit more depressed. I think  
12 when he found out that I was going to the University  
13 of South Carolina, he became kind of even more  
14 depressed, but I kind of knew of that in his family,  
15 that the mental health issues kind of ran in his  
16 family.

17 Q. At some point, did you learn of the  
18 criminal matter involving Dr. Ohrt?

19 A. Yes.

20 Q. How did you first hear about this?

21 A. I heard about it in the news. I think I  
22 was living here, in Charlotte.

23 Q. Were you surprised?

24 A. Yes and no, I guess. Looking back now,  
25 seeing how close he was with John, it's not really

1 surprising, but also surprising that I was around  
2 during that time, I guess.

3 Q. And when you say you were around during  
4 that time, you mean during high school; is that  
5 right?

6 A. Correct. Yes.

7 Q. Okay. And during the time that you were  
8 around in high school, you did not suspect that  
9 there were any inappropriate relationship between  
10 Dr. Ohrt and John?

11 A. I mean, they would text and call each  
12 other, which I thought was odd, but I was also a kid  
13 at the time, so...

14 Q. Did John ever show you any of the text  
15 messages from Dr. Ohrt?

16 A. No, not to my recollection.

17 Q. Were any of the text messages, to your  
18 knowledge, inappropriate?

19 A. Not to my knowledge.

20 Q. After you heard the news that there was  
21 a criminal matter involving Dr. Ohrt, did you  
22 contact John at all?

23 A. No.

24 Q. Did you tell your mother about it?

25 A. I think my mother was the one who told

1 me about it, actually.

2 Q. Did your mother ever tell you that she  
3 was surprised to hear this?

4 A. No.

5 Q. Did your mother ever think that there  
6 was anything inappropriate between Dr. Ohrt and John  
7 Calderaio?

8 A. I think she thought their relationship  
9 was inappropriate. She said to me that it was  
10 weird, but she never -- she never said anything in  
11 high school to me. This was after the fact, when  
12 she found out about the criminal records.

13 Q. Is there any other information that I  
14 may not have directly asked you that you believe I  
15 should know, relating to John's relationship with  
16 Dr. Ohrt?

17 A. No, I don't think so. I think you kind  
18 of asked me everything. He would drive his car  
19 around, and I can't remember if that was during high  
20 school or after, but I remember he would show up  
21 driving Dr. Ohrt's car. He would show up to our  
22 house.

23 Q. And you weren't sure if that was while  
24 he was in high school or after high school, right?

25 A. I'm not sure. Yeah.

1 Q. And you did say that one time you spoke  
2 with John, about three years ago; is that right?

3 A. Yes.

4 Q. And he said during that conversation  
5 that he was starting to go to therapy; is that  
6 right?

7 A. Yes.

8 Q. Did he tell you anything about the  
9 therapy?

10 A. No.

11 Q. Did he tell you anything about Dr. Ohrt  
12 during that conversation?

13 A. Not to my recollection.

14 ATTORNEY TOTH: Thank you very much,  
15 Chloe. Those are the only questions I have  
16 for you. Mr. Shubin may have some follow-up  
17 questions.

18 (Break in proceedings.)

19

20 E X A M I N A T I O N

21 BY ATTORNEY SHUBIN:

22 Q. Good morning, Chloe.

23 A. Good morning.

24 Q. Do you recall what year John was in at  
25 school when the family house was sold?

1 A. The first one or the second one?

2 Q. Let's start with the first one.

3 A. The first one I believe was sold in the  
4 seventh grade.

5 Q. Okay. And then the second one?

6 A. The second one, I can't remember a time.  
7 In between ninth and 11th grade. I know that's very  
8 broad.

9 Q. Was it at a time when the two of you  
10 were dating?

11 A. Not to my knowledge. Not to my  
12 recollection.

13 Q. You were dating in the tenth grade,  
14 correct?

15 A. Yes, we dated for a few months in the  
16 tenth grade.

17 Q. Okay. And was the family house -- had  
18 it been sold at that point, or was it sold after you  
19 first dated?

20 A. I can't remember if it was sold at that  
21 time.

22 Q. Did John's life change, in your opinion,  
23 after the second family house was sold?

24 A. I think his life changed when his  
25 parents separated.

1 Q. Okay. Was the house sold at the same  
2 time as the separation or shortly thereafter?

3 A. No. They had been separated for a  
4 while, and the dad kept the house for a little  
5 while.

6 Q. So the dad remained in the second family  
7 house for a while; is that right?

8 A. Yes.

9 ATTORNEY SHUBIN: Okay. I have nothing  
10 else.

11 ATTORNEY TOTH: Thank you, Chloe. I  
12 appreciate you taking the time to speak with  
13 us and appear this morning.

14 (Deposition adjourned at 10:52 p.m.)

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1 COMMONWEALTH OF VIRGINIA AT LARGE, to wit:

2 I, Rhonda D. Tuck, RPR, CRR, Notary Public in  
3 and for the Commonwealth of Virginia at Large, and  
4 whose commission expires on May 31, 2028, do certify  
5 that the aforementioned appeared before me, via  
6 remote videoconferencing, was sworn by me, and was  
7 thereupon examined by counsel; and that the  
8 foregoing is a true, correct, and full transcript of  
9 the testimony adduced.

10 I further certify that I am neither related to  
11 nor associated with any counsel or party to this  
12 proceeding, nor otherwise interested in the event  
13 thereof.

14 I further certify that prior to the close of  
15 the deposition, the witness did not request to  
16 review the transcript.

17 Given under my hand and notarial seal in  
18 Fluvanna County, Virginia, this 7th day of April,  
19 2025.

20  
21   
22

23 Rhonda D. Tuck, RPR, CRR

Notary Public Registration No. 224847

24 Commonwealth of Virginia at Large

25 Job No. 7275285